



EXECUTIVE OFFICE OF THE PRESIDENT

OFFICE OF MANAGEMENT AND BUDGET

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MEMORANDUM FOR PRIVACY ACT OVERSIGHT OFFICIALS

Subject: Application of Subsection (m) of the Privacy Act

Attached for your information is a recent legal opinion from the OMB Office of General Counsel interpreting the applicability of subsection (m) of the Privacy Act to certain research and other contracts.

We request that you review your agency's policies and procedures for handling personal records under the control of contractors to assure that these records systems are maintained in accordance with this interpretation of the Privacy Act.

If there are any questions, please contact the Information Systems Policy Division at 395-3785.

Sincerely,

Walter W. Haase
Deputy Associate Director
for Information Systems Policy

Attachment

November 30, 1979

MEMORANDUM FOR: Mary M. Coggin, Chief
Administrative Law Branch, HEW

FROM: William M. Nichols

SUBJECT: Application of Subsection (m) of the
Privacy Act

This is in response to your request for our comments on the HEW interpretation of the application of subsection (m) of the Privacy Act (5 U.S.C. 552a) to certain research and other (unspecified) contracts. Subsection (m) provides that:

"When an agency provides by a contract for the operation by or on behalf of the agency of a system of records to accomplish an agency function, the agency shall, consistent with its Authority, cause the requirements of this section to be applied to such system. For purposes of subsection (1) of this section any such contractor and any employee of such contractor, if such contract is agreed to on or after the effective date of this section, shall be considered to be an employee of an agency."

The HEW position, as stated in the memorandum entitled "Application of Privacy Act to HEW Contracts," from William H. Taft, General Counsel, to John Ottina, Assistant Secretary for Administration and Management, dated May 17, 1976, (so-called "Taft memorandum"), is that:

"...the requirements of the Privacy Act of 1974 are not applicable to HEW research and other contracts which call for the contractor merely to furnish to the HEW contracting agency statistical or other reports, even though it is necessary for the contractor to establish a system of records to perform the contract.

* * *

Where the contracting agency is interested only in obtaining the results of the research or other work performed under the contract (generally in the form of a report) and does not require the contractor to furnish it individually identifiable records from the system established by the contractor, it cannot be said that the system is one which 'but for' the contract, the agency would have established." (Taft memo, p. 2).

We disagree with this interpretation. The application of Subsection (m) is not dependent upon the disclosure of individually identifiable records by the contractor to the agency. Nothing in the statute, its legislative history, or the OMB Privacy Act Implementation Guidelines (40 Fed. Reg. No. 132, Wednesday, July 9, 1975, p. 28948) supports such a reading of the law.

The contract puts the personally identifiable information into the hands of the contractor. The data would have been collected and maintained by the agency if the work performed under contract had remained in-house. The contractor is performing an agency function and the Act applies.

ADMINISTRATION OF THE PRIVACY ACT OF 1974

Office of Management and Budget
Information Systems Policy Division
January 4, 1980

FOREWORD

The Privacy Act of 1974 (Public Law 93-579) was enacted to ensure an appropriate balance between the Federal Government's need for information about its citizens and the individual's right to privacy. The Act seeks to achieve this objective by establishing procedures to regulate the collection, maintenance, use and dissemination of personal information by Federal agencies. The Act establishes a system of checks and balances to ensure the effective operation of these procedures. These checks and balances include provisions for the exercise of individual rights, public scrutiny of agency recordkeeping practices, Office of Management and Budget and congressional oversight of agency activities, and both civil and criminal sanctions.

This document summarizes OMB activities to implement the Act and outlines the internal processes established by OMB to exercise its oversight responsibilities under the Act. This document is being provided to Federal agencies and the public to foster a greater understanding of how the administrative processes work, and to provide greater opportunities for the public to participate in these processes by understanding how they work and by making suggestions for their improvement. Comments and suggestions are welcome.

Walter W. Haase
Deputy Associate Director
for Information Systems Policy

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BASIC PROVISIONS OF THE ACT

The Privacy Act of 1974 recognizes a fundamental right of individual privacy, and sets forth a system of checks and balances to regulate the collection, maintenance, use and dissemination of personal information by the Federal Government. The provisions of the Act are designed to achieve a balance between the Government's need for information and the individual's right to privacy. The Act:

1. Establishes certain rights of individuals. Individuals must be permitted to:
 - ° Know the authority under which information about them is collected, the purpose for which it is collected, how it will be used, and the effect on them of not providing information.
 - ° Review agency records about them and to review agency records on any disclosure of this information.
 - ° Request that personal information which they believe to be incorrect be amended, corrected or removed.
 - ° Appeal agency denials of requests for amendment or correction.
 - ° Sue an agency in U.S. District Court for certain violations of the Act.
2. Makes the heads of Federal agencies responsible and accountable for complying with operational requirements established by the Act. Agency heads must:
 - ° Appropriately balance the Government's need for information with an individual's right to privacy.
 - ° Comply with standards and procedural provisions of the Act pertaining to the collection, maintenance, use and dissemination of personal information.
 - ° Collect and maintain only that personal information which is relevant and necessary to carry out agency functions authorized by law or executive order.
 - ° Ensure that individuals are given a way to exercise their rights under the Act.

- Open their agencies' personal recordkeeping practices to public scrutiny.
 - Safeguard personal data and prevent its unauthorized disclosure.
3. Provides for enforcement of the provisions of the Act through a number of checks, balances and sanctions. The Act, which is based on the concept of agency accountability, provides for enforcement through:
- The exercise of rights by individuals.
 - Subjecting the agency's personal recordkeeping practices to public scrutiny.
 - Civil sanctions which can be exercised against the Government for certain violations.
 - Criminal sanctions which can be exercised against any Federal employee for certain violations and against members of the public at large for certain violations.
4. Makes OMB responsible for overseeing administration of the Act. Specifically, OMB must:
- Provide guidelines and regulations for use by the agencies.
 - Provide continuing assistance to agencies.
 - Oversee the procedural mechanisms established by the Act.

IMPLEMENTATION APPROACH

OMB's approach to implementing and overseeing administration of the Act has been directed toward:

1. Ensuring that the heads of agencies and Federal employees understand their obligations and responsibilities under the Act.
2. Developing and issuing guidelines and otherwise assisting agencies in their implementation of the provisions of the Act.
3. Allowing for agency discretion in the manner by which they fulfill their responsibilities under the Act, by minimizing issuance of regulations and detailed procedures by OMB.

4. Closely monitoring agencies' administration of the Act calling their attention to apparent violations, and requesting them to take appropriate corrective action.
5. Using existing management control processes and the people administering those processes wherever possible to assist in administering the requirements of the Act.
6. Establishing a system of checks and balances to ensure effective operation and enforcement of the Act.

Consistent with this approach, OMB has delegated responsibility for developing privacy policy guidance (within the framework of OMB policy and oversight) to a number of other central policy agencies. For example:

- ° The Director of the Office of Personnel Management (formerly the Civil Service Commission) was made responsible for revising Federal personnel management regulations to reflect privacy considerations -- thereby making all agency personnel officers responsible for assuring compliance with Federal personnel privacy policies and procedures.
- ° The Administrator of the General Services Administration was made responsible for revising Federal records storage and archiving regulations to incorporate privacy considerations -- thereby making those considerations part of the job of every records manager.
- ° Similar assignments of responsibility were made in other functional areas such as procurement and clearance of reports under the Federal Reports Act. Each assignment was made to take advantage of existing functional processes and incorporate privacy considerations into the day-to-day operations of existing organizations.
- ° Many of the OMB oversight functions have been incorporated in the existing budget and legislative review processes.

This approach:

- ° Instills privacy awareness and consciousness in a larger number of people than would be possible by other means.
- ° Takes advantage of the functional expertise which exists in various central policy agencies.

- Makes privacy consideration a responsibility of many people -- all of whom are subject to criminal sanctions for certain improper actions.
- Avoids excessive costs by using existing administrative processes and personnel.

POLICY GUIDANCE

A wide range of policy, guidelines and interpretations of the requirements of the Act has been developed and issued to guide agencies in their administration of the Act. The most significant of these are listed below.

Presidential Policy Direction

- President Ford's January 1975 press release issued upon signing of the Act.
- President Ford's September 29, 1975 statement issued on the effective date of the Act stressed the importance of the Act and his support for it.
- President Ford's July 20, 1976 letters to the Speaker of the House and the President of the Senate transmitted the First Annual Report to Congress on executive branch activities to comply with the Privacy Act.
- President Carter's June 30, 1977 letters to the Speaker of the House and the President of the Senate transmitted the Second Annual Report to the Congress on executive branch activities to comply with the Privacy Act. The President endorsed the efforts of OMB to reduce Government intrusion into the private lives of Americans and urged the Congress to consider the Federal experience in deliberations on future privacy legislation.
- President Carter's July 20, 1978 letters to the Speaker of the House and the President of the Senate transmitted the Third Annual Report to Congress on executive branch activities to comply with the Privacy Act. The President indicated that personal privacy was an important priority of his Administration.
- President Carter's August 31, 1978 memorandum to the heads of executive departments and agencies requested agency heads to initiate further efforts to reduce the amount of personal information collected by their agencies, avoid the unwarranted disclosure of this information and improve their internal management of personal data systems.

- ° President Carter's April 2, 1979 message to Congress announced a wide range of initiatives to protect individual privacy. To implement these policies the President proposed four new bills providing privacy protection for medical records, federally funded research records, financial records, and news media notes and materials. The President asked that new procedures be set for Federal agencies' administrative actions and called for action by State and local governments and the private sector to voluntarily adopt recordkeeping practices which would provide an appropriate level of protection for individual privacy.
- ° President Carter's August 16, 1979 letters to the Speaker of the House and the President of the Senate transmitted the Fourth Annual Report to Congress on executive branch activities to comply with the Privacy Act. The President urged the Congress to carefully consider the Administration's record of progress in implementing the Act as it considered the Administration's legislative proposals on individual privacy.

OMB Policy Direction

- * ° OMB Circular No. A-108 dated July 1, 1975, outlines agency responsibilities for implementing and administering the Act.
 - T.M. No. 1, dated September 30, 1975, sets forth agency requirements for proposals to establish or alter personal data systems.
 - T.M. No. 2, dated March 25, 1976, and T.M. No. 4, dated January 31, 1978, set forth agency reporting requirements for the annual report to Congress.
 - T.M. No. 3, dated May 17, 1976, sets forth revised guidance on agency proposals to establish or alter systems, establishes a provision for waiving the 60 day advance notice period, and provides for public review of the new system proposals.
 - T.M. No. 5, dated August 3, 1978, transfers to OMB the responsibilities for issuing policies regarding Government telecommunications relative to the Privacy Act.
- * ° Guidelines to agencies for implementing the Privacy Act issued by OMB as a supplement to OMB Circular No. A-108 on July 1, 1975 and amended on November 21, 1975.
- ° Director Lance's memorandum to agency heads, dated March 7, 1977, on

the reduction of personal recordkeeping in the course of efforts to reduce public reporting burden. This letter was followed by individual letters to heads of 15 major recordkeeping agencies requesting specific plans for reducing personal recordkeeping by their agencies.

- Director Lance's August 3, 1977 memorandum to agency heads, transmitted the President's Second Annual Report to the Congress and requested further efforts at reducing personal recordkeeping.
- ✕ ◦ OMB Circular No. A-71, T.M. No. 1, "Security of Federal Automated Information Systems," was issued on July 27, 1978 to ensure protection of personal, proprietary and other sensitive data in Government computers.
- ✕ ◦ Director McIntyre's March 30, 1979 memorandum to agency heads provided guidelines to agencies for computer matching of personal records.
- ✕ ◦ Director McIntyre's May 22, 1979 memorandum to agency heads summarized President Carter's privacy initiatives and required each agency head to designate an office or official to bear oversight responsibility for the administration of the Privacy Act within that agency.
- ✕ ◦ Mr. Walter W. Haase's January 2, 1980 memorandum to agency Privacy Act oversight officials transmitting an OMB legal opinion regarding the application of Privacy Act requirements for publishing systems of records to research and other contractors who maintain agency records containing personal data.

Office of Personnel Management Policy Direction

✕ OMB Circular No. A-108 assigned the Office of Personnel Management responsibility for revising civilian personnel recordkeeping policies to conform with the Act and to train agency personnel in the requirements of the Act. Policy guidance issued by OPM includes:

- Revision of Federal Personnel Manual, Chapters 293 and 297, September 30, 1975.
- Notices describing the operation of four government-wide systems of personnel records which are maintained for OPM by operating agencies published August 27, 1975 and May 29, 1979.
- Regulations for the conduct of Federal service suitability investigations, FPM Chapter 736, December 4, 1975.

- ° Federal Personnel Manual letter 732-7 "Personnel Security Program for Positions Associated with Federal Computer Systems," November 14, 1978.

General Services Administration Policy Guidance

The Act assigned responsibility to the GSA for coordinating agency publication of Privacy Act notices and for preparing the Annual Compilation of rules and notices. OMB Circular No. A-108 assigned GSA responsibility for the issuance of policies pertaining to privacy consideration in records management and storage, in interagency data collection forms, and in the procurement of computer/communications systems. Policy guidance issued by GSA includes:

- ° "Guidelines for Records Management Systems to Implement the Privacy Act," issued by the National Archives and Records Service, August 1975.
- ° GSA Bulletin FPMR B-57, dated August 22, 1975, regarding agency records stored in Federal records centers.
- ° FPMR Temp. Reg. E-43, "ADP and Telecommunications Checklist," dated October 17, 1975, establishing a checklist of privacy and other requirements to be considered in agency procurement of computer and communications systems.
- ° FPR Amendment 155, dated September 23, 1975, establishing rules and procedures for Government contracts involving personal recordkeeping.
- ° FPMR 101-35.17, dated June 16, 1978, "Privacy and Data Security for ADP and Telecommunications Systems."
- ° Publication requirements for the Privacy Act of 1974, dated June 17, 1975, updated April 8, 1977 and June 1, 1978.

Department of Commerce Policy Guidance

OMB Circular No. A-108 assigned the National Bureau of Standards (NBS) responsibility for developing and issuing standards and guidelines on computer security. Guidance issued includes:

- ° FIPS Pub 41 "Computer Security Guidelines for Implementing the Privacy Act of 1974," dated May 30, 1975.
- ° "Index of Automated System Design Requirements," dated October 1975.
- ° NBS Technical Note 1020, "Guidelines for Privacy and Security in Computer Systems."

- ° NBS Technical Note 906, "A Methodology for Evaluation of Alternative Technical and Information Management Approaches to Privacy Requirements."
- ° Special Publication 500-10, "A Data Base Management Approach to Privacy Act Compliance."

Department of Justice Policy Guidance

The Department of Justice has issued two policy letters regarding the Privacy Act:

- ° Establishment of "routine uses" for the referral of information for law enforcement and Federal employment purposes, dated June 5, 1975.
- ° Disclosure of Payroll Information to State/local Taxing Jurisdiction in the Absence of Withholding Agreements, dated March 23, 1976.

Privacy Act Litigation

The Act and all the policies, procedures and regulations which have been established to implement the Act are designed to seek an appropriate balance between Government needs for personal information and an individual's right to privacy. This balancing of conflicting interests will inevitably result in differences of judgment between individuals and the Government which can only be resolved in the courts. This case law will, over time, provide additional interpretive guidance. During 1976 and 1977, 210 suits were filed. At the end of 1978, 101 suits remained unresolved.

Since the Privacy Act and the Freedom of Information Act (FOIA) are both parts of the same statute (5 U.S.C. 551 et. seq.) and deal with access to Government records, many lawsuits are brought under both Acts. Thus, FOIA and Privacy Act case laws are related and familiarity with both is helpful to an understanding of either.

INVENTORY OF FEDERAL PERSONAL DATA SYSTEMS

A computerized inventory of all Federal personal data systems subject to the Act is maintained by OMB to:

- ° Describe the size, nature and purpose of personal information systems maintained by Federal agencies.

- ° Observe and analyze agency use of the exemption provisions, use of computers for processing personal data, and a wide variety of other trends as a basis for formulating further policy by OMB.
- ° Measure agency accomplishments in reducing (or curtailing growth in) the number and type of personal records which they maintain.

The 1978 inventory contained description of 5,881 personal data systems maintained by Federal agencies. It is periodically updated based on information contained in agency reports on new and altered systems submitted to OMB and information contained in agency systems notices published in the Federal Register.

Annually, the agencies are asked to validate and update the inventory as a part of the information which they submit for the President's Annual Report to Congress.

PRESIDENT'S ANNUAL REPORT TO CONGRESS

The Privacy Act requires the President to report annually to the Speaker of the House and President of the Senate on executive branch activities to comply with the Privacy Act. OMB prepares the President's Report based on agency reports.

Consistent with the policy of agency accountability for complying with the requirements of the Act, agencies are required to provide annual reports on their administration of the Act to OMB. The requirements placed on agencies by OMB stress reporting of:

- ° Agency accomplishments and plans for protecting individual privacy and reducing the magnitude of personal records maintained by the agency.
- ° Agency actions to ensure that individuals are allowed to exercise their rights, to open their recordkeeping practices to public scrutiny, and to administer the exemption provision.
- ° Agency recommendations on actions that should be taken to address major problems that have arisen in their administration of the provisions of the Act -- through changes in Administration policies or by seeking legislative changes to the Act.

The agency reports are analyzed by OMB and used to prepare the President's Annual Report to Congress. To date, four annual reports have been submitted to Congress, one by

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REVIEW OF AGENCY RULES AND NOTICES

The Act requires agencies to publish rules (in accordance with the Administrative Procedure Act) to advise the public of procedures for exercising their rights under the Act and agency justification for invoking certain exemptions permitted by the Act. It also requires agencies to annually publish notices describing each of their personal data systems subject to the Act in order to provide for public review of their recordkeeping practices.

The Act required agencies to publish these rules and initial notices by September 27, 1975. OMB convened a task force of agency personnel to assist agencies in preparing and issuing their rules in accordance with the requirements of the Act and to achieve some degree of consistency in rules for similar systems.

The OMB staff oversees agency rulemaking and the publication of notices by reviewing the Federal Register daily and providing comments on agency issuances as necessary.

REVIEW OF REPORTS ON NEW AND ALTERED SYSTEMS

The Act states that "each agency shall provide adequate advance notice to Congress and the Office of Management and Budget of any proposal to establish or alter any system of records in order to permit an evaluation of the probable or potential effect of such proposal on the privacy and other personal or property rights of individuals..."

OMB policies implementing this provision require agencies to submit reports on proposed new or altered systems (RONS) to Congress and OMB 60 days prior to the issuance of any data collection forms or instructions, 60 days before entering any personal information into the new or altered system, or 60 days prior to the issuance of any requests for proposals for computer and communications systems or services to support such systems, whichever is earlier.

OMB Review of RONS

Each RONS is reviewed by OMB to:

- ° Determine whether the agency has adequately complied with the reporting criteria established by OMB -- in form and substance.
- ° Determine whether the system is consistent with agency mission requirements.

- ° Determine whether appropriate consideration has been given to personal privacy consistent with the letter, spirit and intent of the Act.

After such review, any action considered necessary is initiated with the agency.

Public review of RONS

While the new system reporting requirements were established primarily for the purposes of congressional and OMB oversight over the development of new (or altered) systems by agencies, OMB has established a process to give the general public an opportunity to comment on the agency proposals.

- ° A summary of agency proposals to establish or alter personal data systems provided to OMB and the Congress is published in the Federal Register by OMB approximately every two weeks.
- ° Copies of this public announcement are mailed directly to the staff of Members of Congress who have indicated an interest in privacy, the trade press and a list of private citizens and organizations which have indicated an interest in privacy. About 95 copies are distributed.

Waiver Procedures

OMB procedures permit a waiver of the advance notice requirement when the agency can show that the delay caused by the 60 day advance notice would not be in the public interest. A waiver of the 60 day advance notice period does not relieve an agency of the obligation to publish a notice describing the system and allow 30 days for public comment on the proposed routine uses of the personal information to be collected.

CONSIDERATION OF PRIVACY IN THE BUDGET PROCESS

Agency budget requests for information system development efforts, computer/telecommunication hardware procurement and software development activities are given special emphasis in the OMB budget review process. Privacy is one of a number of important policy issues that are closely examined in this process.

Internal OMB procedures for reviewing agency budget proposals establish stringent criteria for reviewing agency budget justifications for information processing activities. These procedures require a review of the agency justifications to ascertain that they --

- ° "Include a clear indication of the necessity for such data collections and the safeguards the agency will employ to preclude inadvertent or surreptitious access by unauthorized persons to such data," and that
- ° "The acquisition of data processing and telecommunication equipment should be reviewed to assure that the requirements of the Privacy Act (P.L. 93-579) have been met."

As a part of the Administration's multi-year budget initiative, OMB requires agencies to identify major computer and telecommunication system acquisitions in the current year, the budget year and each year for four years beyond the budget year. OMB provides this information to Congress in order to provide earlier opportunities for congressional review of agency plans. The list of acquisitions are provided to GSA to assist them in carrying out their computer procurement control functions. This additional review provides an opportunity to evaluate the probable impact of these systems on personal privacy.

CONSIDERATION OF PRIVACY IN THE LEGISLATIVE REVIEW PROCESS

The legislative coordination and clearance responsibilities of OMB are an important corollary to OMB budget and management functions, since the President's program and budget recommendations are dependent upon legislation to carry out the proposals.

The OMB legislative coordination and clearance process includes assisting in the preparation of the President's legislative program, coordinating and clearing of agency legislative reports and draft bills, responding to requests of committees of the Congress for OMB reports and testifying on pending bills and handling of enrolled bills.

The process is coordinated by a central staff in OMB which seeks the views and judgments of many people, both in OMB and throughout the Government, before advising the President through the Director. It is through this means that privacy is considered and balanced with other policy and budget considerations.

Examples of recent bills which involved privacy questions are the Tax Reform Act of 1976, the Social Services Amendments, and the Right to Financial Privacy Bill. Other examples are agency draft bills on confidentiality of private sector reporting data, access by the Census Bureau to educational records, disclosure of VA records for longitudinal medical studies, and standards for enlistment in the Armed Forces.

HANDLING OF PUBLIC INQUIRIES

OMB, by virtue of its oversight responsibilities, receives a large volume of inquiries by telephone and mail about the Act. These include citizen complaints on Government actions, inquiries regarding rights and privileges under the Act, Foreign, State, and local government inquiries on U.S. Federal Government experience under the Act, and a wide range of other questions.

Public inquiries are generally handled as follows:

- ° Informational inquiries or those seeking interpretation of Federal policy and experience are handled directly by OMB.
- ° Complaints about a particular agency's practices are usually answered by providing individuals with information on their rights and agency responsibilities under the Act and then referring the complaint to the responsible agency. Follow-up action with the agency is initiated only in those cases where the agency does not appear to be fulfilling its responsibilities under the Act.

IMPACT ON GOVERNMENT OPERATIONS

A number of provisions of the Act were designed to change existing agency practices on the collection and disclosure of personal data. These changes have had an impact on the patterns of information exchange about individuals. Experience to date indicates that:

- ° The public is becoming more reluctant to provide personal data and willing to challenge Federal agency requests for information.
- ° Agencies are demonstrating more caution in exchanging personal data.
- ° Some agencies are experiencing difficulty in obtaining personal information from third party sources. They indicate that less information is being provided and the information that is provided is less candid.
- ° Inconsistencies between Federal, State, and local privacy laws have created some problems in obtaining personal information from academic institutions, lending organizations and medical facilities.

However, no agency has indicated that the provisions of the Act have made it impossible to obtain information needed to carry out Federal programs.

IMPACT ON PRIVACY OF INDIVIDUALS

While it is difficult, if not impossible, to quantify "privacy protection" achieved by the Act, there are a number of measures and subjective observations which suggest that the Act has had a significant impact on achieving a better balance between the Government's need for information and protecting an individual's right to privacy.

- ° Review of agency proposals for new and altered systems and public scrutiny of agency recordkeeping practices suggest that the majority of personal information collected is proper and necessary to carry out Government functions.
- ° Agencies report that they have received very few questions from Congress about their proposals for new or altered systems and very few comments from the public at large on their personal recordkeeping practices as described in public notices.
- ° Privacy administrators in the agencies believe that the privacy consciousness which has been created by the Act, coupled with its sanctions, has established a deterrent to unnecessary or improper collection of personal information and has created greater sensitivity to proper and fair handling of such information.
- ° During the first four years of the Privacy Act implementation both the number of agency systems of personal records and the number of individual records have been significantly reduced.
- ° Further statistics on the effects of the Act are contained in the four Annual Reports to Congress.

In summary, OMB believes that the intended purposes of the Act are being achieved and that the agencies are sincerely working to establish and operate effective privacy protection programs. We draw this conclusion despite the fact that the effectiveness of privacy protection is not something that is susceptible to quantitative measurement and proof. Nor is it something that is possible to achieve merely by regulatory fiat. Rather, it can only be brought about by instilling a continuing concern for privacy in the consciousness of over two million Federal workers, many of whom are involved daily in the

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personal records. The procedures which have been established to administer the Act, along with continual OMB, congressional and public oversight of these activities have sensitized the Federal workforce to the concerns of privacy and are working to achieve the objectives of the Act.

STATINTL

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